



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CRH/JMH/EHS
F. #2017R00906

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 21, 2021

By Email and USAFx

Paul A. Goldberger
Renee Melinda Wong
c/o Goldberger & Dubin PC
401 Broadway, Suite 306
New York, New York 10013

Re: United States v. Congying Zheng
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, supplementing our productions dated May 25, July 12, and August 5, 2021. The government also requests reciprocal discovery from the defendant. Pursuant to Rule 16.1 of the Federal Rules of Criminal Procedure, the government remains available to confer further about pretrial discovery at a mutually convenient time.

The materials provided with today's production collectively bear Bates numbers CZ001852 through CZ002384. The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 ("the Protective Order"). The government considers certain of the materials produced today to constitute "sensitive discovery material" as that term is defined in the Protective Order. See Protective Order ¶¶ 7-9. Such materials have been separated within the production and have been individually endorsed with the legend "sensitive discovery material."

Today's production will be delivered via the USAFx platform. We recommend that you download a copy of the production for your archives as soon as practicable. Please do not hesitate to contact us if you have any difficulty accessing or downloading the production.

Description	Begin Bates	End Bates
Extended Stay America, Inc. records	CZ001852	CZ001857
Panera Bread Company records	CZ001858	CZ001892
Millburn Township Police records	CZ001893	CZ001894
Warren Township Police records	CZ001895	CZ001897
Oath Holdings, Inc. (Yahoo) data and records related to search warrant, docket no. 17-MJ-995	CZ001898	CZ002002
Photographs from New Jersey residence, taken on or about September 5, 2018	CZ002003	CZ002007
Documents found at a New Jersey residence, on or about September 5, 2018, and associated draft translations	CZ002008	CZ002015
Facebook Inc. messages sent by “Tony Lee”	CZ002016	CZ002017
Warren Township Police records	CZ002018	CZ002022
Surveillance footage from residence taken on or about September 4 and 5, 2018	CZ002023	CZ002024
AT&T Corp. records and data related to search warrant, docket no. 18-MC-2514	CZ002025	CZ002032
Copies of mailings sent to victims	CZ002033	CZ002050
Draft translations of mailings sent to victims	CZ002051	CZ002192
Facebook records and corresponding draft translation	CZ002193	CZ002213
Photographs of night vision goggles and associated materials	CZ002214	CZ002225
New Jersey Motor Vehicle Commission records	CZ002226	CZ002339

Description	Begin Bates	End Bates
FBI Laboratory Report	CZ002340	CZ002342
FBI Laboratory Report	CZ002343	CZ002344
FBI Laboratory Report	CZ002345	CZ002346
FBI Laboratory Report	CZ002347	CZ002348
FBI Laboratory Report	CZ002349	CZ002355
FBI Laboratory Report	CZ002356	CZ002362
FBI Laboratory Report	CZ002363	CZ002372
AT&T Corp. records and data related to search warrant, docket no. 18-MC-2514	CZ002373	CZ002373
T-Mobile US, Inc. records and data related to search warrant, docket no. 19-MC-2941	CZ002374	CZ002374
Lycamobile records and data related to search warrant, docket no. 19-MC-2941	CZ002375	CZ002375
Verizon Wireless records and data related to search warrant, docket no. 19-MC-2941	CZ002376	CZ002376
Select WeChat messages and corresponding draft translations	CZ002377	CZ002380
T-Mobile US, Inc. records and data related to search warrant, docket no. 18-MC-2514	CZ002381	CZ002381
T-Mobile US, Inc. records and data related to search warrant, docket no. 19-MJ-694	CZ002382	CZ002382
Surveillance footage from residence taken on or about September 4 and 5, 2018	CZ002383	CZ002383
Oath, Inc. (AOL) records and data	CZ002384	CZ002384

Future Discussions

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/ J. Matthew Haggans
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J. Matthew Haggans
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Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)